



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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January 11, 2010

Mr. Michael H. Jones
Naval Facilities Engineering Command, Mid-Atlantic
6506 Hampton Boulevard
Building C, Room 3012
Norfolk, Virginia 23508-1278

SUBJECT: Final Environmental Impact Statement for the U.S. Marine Corps Grow the Force at Marine Corps Base Camp Lejeune, Marine Corps Air Station New River and Marine Corps Air Station Cherry Point, North Carolina; CEQ Number 20090416

Dear Mr. Jones:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The United States Marine Corps (USMC) proposes to permanently increase USMC forces at three installations: Marine Corps Base (MCB) Camp Lejeune and Marine Corps Air Station (MCAS) New River in Onslow County, and MCAS Cherry Point in Carteret and Craven Counties, North Carolina. MCB Camp Lejeune and MCAS New River are located in southeastern North Carolina, approximately 50 miles north-northeast of Wilmington. MCAS New River abuts MCB Camp Lejeune and uses services (i.e., utilities and roads infrastructure) provided/maintained by MCB Camp Lejeune. MCAS Cherry Point is located approximately 50 miles east-northeast of MCB Camp Lejeune in Havelock, North Carolina.

Three action alternatives (Alternatives 2-4) were considered in the Final EIS to accommodate the proposed increase in personnel. All three alternatives include the same amount of personnel increase at the three installations. The differences among alternatives were related to the amount of construction necessary to adequately house and support these new units. Alternative 2, USMC's preferred alternative, includes implementation of new construction to support the permanent increase in base personnel, as well as additional core construction projects, which are currently planned for these installations but not as it relates to the personnel increase. Alternative 3 includes the implementation of only core construction projects. Alternative 4 does not include any new construction projects. The increased personnel would be accommodated within existing facilities or temporary/relocatable buildings already built. The no action alternative (Alternative 1), which does not include any permanent increase in USMC personnel, was also considered.

In the Draft EIS, EPA raised concerns about potential changes in air quality associated with the proposed action and recommended several actions that the USMC could implement

during construction and operations to minimize air quality impacts in the future. EPA appreciates the responses to our comments on air quality. The Final EIS identifies a number of important emission reduction practices, such as: 1) idle-reduction practices; 2) switching to ultra low-sulfur diesel fuel; 3) retrofitting equipment to reduce emissions; 4) installing EPA-approved catalysts and filters; and 5) following the Leadership in Energy and Environmental Design (LEED) Green Building Rating System to require that all new construction meet LEED Silver Level certification (or better). Based on the inclusion of these practices in the Final EIS, it appears that the USMC is committed to implementing a number of EPA's suggestions with regard to strategies to reduce air quality impacts. However, EPA recommends inclusion of these air quality environmental performance commitments as part of the Record of Decision (ROD). These are measures that should be proactively implemented to avoid or reduce potential air quality impacts of the project.


Furthermore as related to minimizing air quality impacts, EPA recommended that the USMC develop additional transportation management strategies to address the transportation system deficiencies that will be created by the proposed actions. In the Final EIS, the USMC provided a response to these comments describing a commitment to promote the use of these programs through currently established and funded initiatives, including van pooling. The Final EIS describes on-base and off-base bus transportation options; however, there is no information to substantiate the efficiency or level of service that these programs provide. Given the potential air quality concerns associated with significant transportation deficiencies in the future, EPA continues to recommend that the USMC develop a comprehensive alternative transportation program, especially for commuters. This program should promote telecommuting, car pooling, and establishing no-cost or low-cost mass transit (possibly hybrid electric or natural gas powered) between popular points on the base and in the surrounding communities. These measures would serve to help this area maintain or improve air quality and improve level-of-service problems at key intersections by decreasing the expected traffic demand. EPA recommends that the ROD include a commitment to implement transportation system management and transit improvement projects in the future as part of an overall transportation master plan for these bases.

EPA also appreciates the additional responses to our comments related to water quality, stream, and wetland impacts. We are pleased to note the USMC's commitment to implement Low Impact Development practices as part of new building construction as well as the identification of several important best management practices to protect water quality. With regard to stream and wetland impacts, EPA understands that the precise locations of project siting within the development areas may change following finalization of design and issuance of the ROD. Therefore, as the overall project continues into later design phases, EPA recommends consideration of siting and design modifications to further minimize the impacts of individual projects to jurisdictional waters. This will be especially true for the new base road in the planning and design of new bridge crossings to keep stormwater runoff from entering these tributaries directly, and use of enhanced swales, stormwater ponds, and sediment basins to capture and treat post-construction stormwater runoff to minimize impacts to important aquatic resources. We continue to encourage appropriate functional replacement for those wetland and stream functions impacted by the project. Such replacement could involve on-site mitigation as close to the impact site as possible, off-site mitigation within the watershed, or a combination of

both approaches. Mitigation should include restoration, enhancement or preservation of wetlands and stream reaches that have been degraded or consideration of other watershed improvements.

In summary, while we continue to believe that additional work should be done toward the development of a comprehensive transportation program, EPA supports the other mitigation measures and monitoring programs as described in the Final EIS. We appreciate the USMC's commitment to adhere to these best management practices to protect air quality, water quality and aquatic habitat. EPA recommends inclusion of these mitigation commitments in the ROD for the project. We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a stylized, cursive script.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management